



Board of Management Report – CL12-01

To: Michelle Smibert, Clerk – Town of Tillsonburg
From: Mark Renaud, Executive Director – Tillsonburg BIA
Date: December 1st, 2020
Subject: Proposed BIA expansion report and analysis

The BIA Board of Management and general membership have approved a proposed plan to expand the current boundaries of the Tillsonburg Business Improvement area.

This report highlights the need and outcomes required with the reports and documentation to support the assumptions.

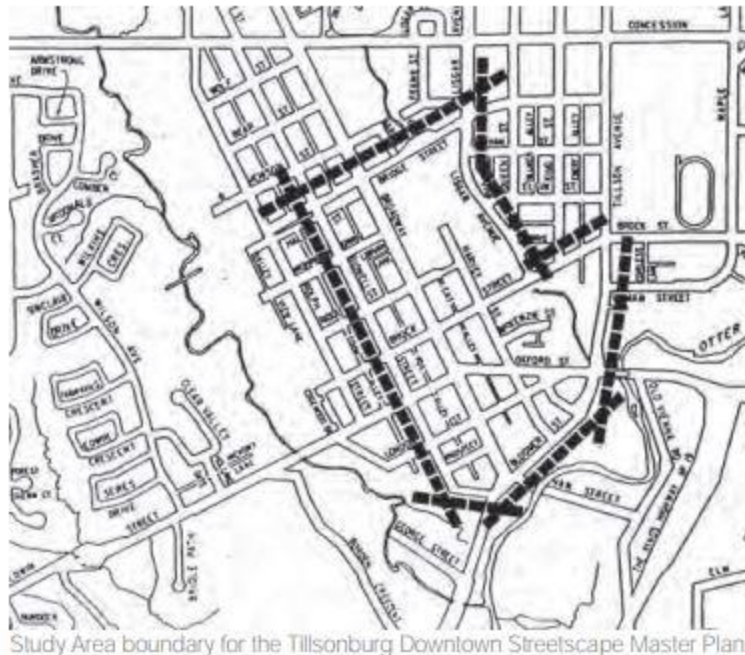
The BIA understands that there is a prescribed process which is clearly articulated under the Ontario Municipal Act and we will follow these guidelines to a tee.

Discussion:

Since its creation in 1978, the BIA has had only minor changes to the boundaries from the zone/map that was originally created. The BIA was formed in anticipation of the construction of the Tillsonburg Town Centre Mall development which at the time was the result of competing proposals for another mall which subsequently was built in the neighbouring County of Norfolk.

The decision by Municipal Council to protect and enhance the downtown Central Business District, (CBD), is consequential as to the successes and the function and efficacy of the existing BIA area. That was true in 1978-1980 with the construction of the Tillsonburg Town Centre Mall, in 2003 for the Canadian Tire construction, to the present day in the Central Business District.

All studies completed in the past 20 years or so reference the CBD as the primary retail node for the town and tri-county areas. This still holds true today and will be discussed in a great level of detail referencing these reports.



The population of Tillsonburg at the time of the BIA creation By-law #2013 was 10,487 (statcan.gc.ca - 1981 Census). The town population is estimated as 18,005 as of October 1st, 2020 (statcan.gc.ca, Town of Tillsonburg building permit data). The town's population has increased by **71.7%** during the past 42 years with minor adjustments made to the boundary at Venison Street to accommodate the new Canadian Tire store which was opened in 2003. Bridge Street was re-aligned to help achieve the land parcel necessary to create the parking areas and store footprint.

There are many ravines in the town and the geographical limitations also play an important factor in the continued development of the downtown area. These limitations preclude significant expansion either west or south. The pragmatic approach is to grow north and predominantly east of the existing boundaries.

Downtown/Central Business District is built out:

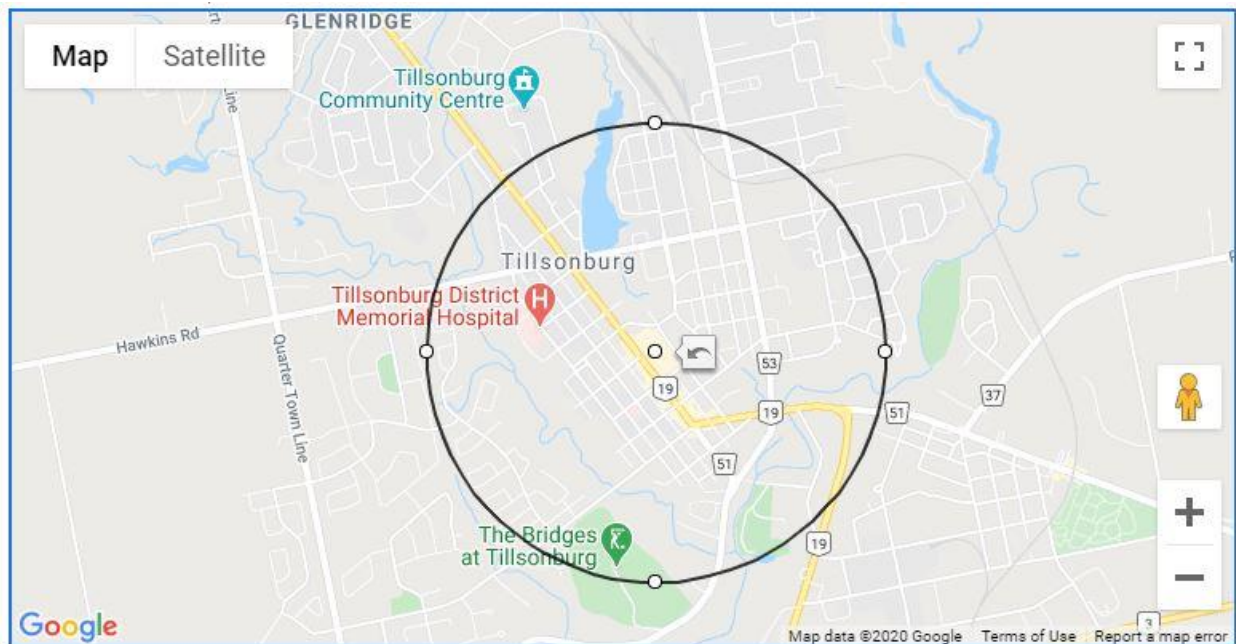
The existing downtown area is largely built-out with low vacancy rates throughout the core area. The BIA ED has had meetings with a number of parties including Strathallen (owner of the Tillsonburg Town Centre Mall) about perspective tenants who wish to locate in the Tillsonburg market area. This includes 2 parties that operate retail box-like stores in the range of 14,000 - 20,000 square feet. These stores would like to locate proximate to or at the existing Tillsonburg Town Centre Mall campus area. To accommodate current demand and future needs; the downtown area needs to expand the physical footprint to address these current needs as well as to properly plan for all future growth.

There will be a discussion about low vacancy rates in the Central Business District further on in this report.

Downtown design best practices:

A thorough review of best practices for urban design illustrates the clear preference for the square shaped downtown zone/Central Business District for many reasons. The first is for the ease of pedestrian movement. The BIA zone expansion encompasses a 1.0 km radius from the existing Town Centre Mall as a rough outline.

It is not practical for the zone to be uniform in shape given the geographic challenges of the ravines as well as the as-built conditions. This planning context was adopted for refinement of the mapping of where it would make sense for pedestrian and vehicular movements. The details of which will also be discussed.



The map also reflects joining the existing retail nodes in the central part of town by creating the “adhesion of interest” between the existing CBD & TILL-CON retail nodes. This is also discussed in the Central Area Design Study.

Linear downtown nodes create a problem and challenge known as fragmentation. The best example of this in the local Ontario context is the City of St. Thomas as contained in the image below and also the City of Woodstock:



St. Thomas has a very fragmented and unfriendly downtown area that is comprised of a very long and narrow swath which is a distance of 2.2 kilometres long by 0.1 kilometres wide. This large area is comprised of disconnected retail, restaurant, services and public spaces. This has led to a dysfunctional, as-built downtown area complicated by the abandoned railway line and poor municipal planning. Unfettered retail development outside of the downtown core has led to a morass of problems which is likely irreversible without a large cost to the taxpayer. The lesson here is that you cannot park your car in one spot and shop downtown without walking for hours.

The best practice for downtown development and growth is a box-style as is currently the case with Tillsonburg although there are some limitations which will be discussed further in this report due to the topography.

Some examples of the box-shape urban area are contained in the image below from a new Riverfront redevelopment in a neighbourhood in Pittsburgh, Pennsylvania. This design and plan has relevancy to the shape and design that can be incorporated into our planned BIA boundary/zone expansion.

It is critical to the exercise to determine what constitutes the best shape and workability for an extension or enlargement of the BIA zone. To this end, a great deal of time and analysis has been undertaken to carefully craft a map and zone that reflects the current realities and geopolitical influences that are shaping the growth of the town.

The BIA team continues to research and learn from the examples that are set before us from jurisdictions across North America. These examples are the most relevant given the context and similarity of the retail landscape in our downtowns. One note of exception is that Tillsonburg is the only municipality in North America where virtually all of the big-box retail stores are located in the CBD most notably the Walmart Supercentre. This is very important in the analysis of the current situation as was the case that was made to keep the new Canadian Tire store in the CBD.

The image contained directly below, outlines the planning and development of a restructured neighbourhood in one specific area of Pittsburgh, Pennsylvania. You will note the shape and design which has been identified as a best practice for urban development. Our expansion initiative follows these exact same parameters.



The intent of the proposed Tillsonburg BIA boundary expansion is to create a concept and vision for growth which respects the as-built condition, provide for greening of the community, meets the requirements of Official Plan and one which fosters positive human development and environment for the short and mid-terms.

Downtown vacancy rate:

The following table outlines the vacancy rates for the existing BIA area broken down into seven (7) specific geographic areas.

Three of the seven categories reflect specifics to the Tillsonburg Town Centre Mall properties known municipally as 170, 200 and 248 Broadway. Vacancy rates are at historic lows. Absorption rates are very high meaning that vacant or empty spaces do not sit for very long periods of time. This pattern has accelerated during 2020 as of late. The BIA team has presented these statistics to the BIA Board of Management and are contained in the minutes for the meetings held in 2020.

It is important to review vacancy rates over a longer period of time to glean trends and impacts. Trends do not however account for demographic and population changes when they are of the magnitude

Location downtown/BIA zone:	2018	2019	2020 YTD	2021 Forecast
Town Centre Mall - Interior retail	0%	0%	0.86%	0%
Town Centre Mall - Exterior retail	33.1%	33.1%	21.4%	0%*
Town Centre Mall - office upper level	40.9%	9.7%	9.7%	9.7%
Broadway street level retail	0.6%	0.4%	0.9%	0%
Broadway upper level residential	1%	0%	0%	0%
Downtown West (off Broadway)	0.9%	0.6%	0.3%	0%
Downtown East (off Broadway)	0.2%	0.2%	0.4%	0%

*Tentative leases in final negotiations with two national chains pending engineering and cost analysis of restaurant hood installation/feasibility.

List of available downtown Broadway retails spaces with approximately square footages as of November 30th, 2020:

69 Broadway - vacant unit between Needful Things and Tillsonburg Beer & Wine Studio

86 Broadway - 4,000 sq. ft. (former OMAC Mortgage/Century 21)

16 London Street East - 650 sq. ft. (unknown - building is in poor condition)

16 Oxford Street - 1,050 sq. ft. - former "Styles on the Go" salon

33 Oxford Street - former used car lot (between Cardinal Muffler & Millards)

21 Ridout Street West - 400 sq. ft. - former barber shop

110 Broadway - 1,100 sq. ft. - former hearing store/chocolate store (under renovation)

200 Broadway - (mall, exterior) Unit A1006 - 2,431 sq. ft. (lease pending)

200 Broadway - (mall, exterior) Unit A1009 - 1,005 sq. ft. (lease pending)

200 Broadway - (mall, upper) Unit A2202 - 369 sq. ft.

200 Broadway - (mall, upper) Unit A2203 - 347 sq. ft.

200 Broadway - (mall, upper) Unit A2207 - 1,099 sq. ft.

The analysis of the existing inventory of vacant space is indicative of a shortage of space for specialty retail including big-box, hotel, full-service restaurant or for specialty services. Of special note; the vacancy rates in the Town Centre Mall also reflects higher than market rents for net/net/net leases which has driven demand to other sites in the CBD. The BIA team is working proactively to address these inequities.

Tillsonburg District Memorial Hospital area (Rolph Street)

TDMH is located just outside the north-east boundary of the BIA zone. The hospital is an important anchor for the town and downtown area. The importance of healthcare in our community cannot be understated. The hospital should be included in the zone given its impact in the downtown core and the linkages to retail and restaurant sectors.

During the past number of years; the TDMH has been buying up and demolishing a number of houses along the Rolph Street corridor to create additional parking lots and potential to relocate some of the existing parking from across the street to accommodate future expansion and spin-off businesses including medical offices and services. This area has undergone significant change during the past number of years.

This area is also home to two (2) long-term care homes which are also proximate to the downtown core area. Anecdotal evidence suggests many walking trips to and from the hospital to the downtown core area. Part of the strategic imperative of urban planning and development is to create walking trails and corridors linking high-use public institutions like hospitals with the Central Business District.

Proposed boundary expansion rationale:

There are studies and reports highlighting which design is most effective for the proper function of a downtown business district. The IDA, (International Downtown Association); has conducted numerous studies indicating what shapes and layouts which are conducive to a well-functioning core area.

The most effective and operational downtowns are in the shape of a box or rectangle encompassing those areas primarily which are walkable with proper connectivity to adjoining residential neighbourhoods. I have attached examples to this report.

The BIA team has carefully analyzed the boundaries with an eye to ensure a balance between the request by businessowners and what makes practical sense.

The gateway areas are clearly indicated in this report separately.

It is important to include town-owned, heritage and tourism attractions as apart of this zone expansion initiative. These will be discussed in the body of this report.

The baseline for determining the new boundary is largely predicated on research already conducted during the Central Area Design Study which remains relevant today. This will be discussed in a fair amount of detail throughout this report.

Creation of new gateway areas:

The proposed BIA boundary expansion allows for the placement and beautification of new gateway areas on Central Broadway, Tillson Ave and Vienna Road near Simcoe Street. The busiest gateway to the downtown area is Simcoe Street from Vienna Road to Tillson Avenue.

The Central Area Design Study contemplated the following as potential future gateway areas marked as the hashed circles on the map below:



The BIA will largely follow this guidance with the exception of the proposed gateway location near the intersection of Vienna Road north and Simcoe Street.

Synergize with existing town-owned/operated facilities:

One of the outlined responsibilities for BIA's under the Municipal Act is the promotion and beautification of town-owned facilities. The boundary expansion will allow for the addition of important town assets to be included for the purposes of promotion and beautification.

A key best practice is to link proximate tourism infrastructure within the BIA boundary. This proposal would see the Community Centre and Annandale House join the Corporate offices and Town Customer Service Centre as part of the BIA. This becomes important in the development of localized tourism during the continued pandemic. These town facilities would benefit directly from the BIA influences without any cost to the facilities.

The BIA boundary expansion creates opportunity to link strategic town assets such as parks, trails, Lake Lisgar, Annandale National Historic Site and Tillsonburg Community Centre. All of these assets and locations are within the 1 kilometre walking radius as illustrated on the mapping and discussions contained in this report.

Plan for continued growth:

The town is experiencing a growth spurt which will create newfound demand for retail capacities. Even with the negative impacts of the pandemic; the existing BIA zone is over-performing its peers with several new businesses opening in 2020 (9), some expansions (3) and relatively few closures vs. other communities in the province.

Strathallen is actively recruiting new retail, service and hospitality businesses to the Town Centre Mall which will absorb the remaining vacant frontage in the 170 Broadway portion of the centre.

The Central Area Design Study is already dated as it includes reference points and data that were completed as far back as 2006.

The Central Area Design Study contemplated that future large-format retail to be located along the northwest-southeast axis of Lisgar Avenue as contained in the image below:

Legend

Large Format Area	
Institutional Buildings	
Improved Edge Condition	
Study Area Boundary	



Impact of the former town landfill

The location and challenges of the old landfill to the east of Harvey Street is problematic in terms of growth and remediation of the brownfield conditions. This also limits the potential for redevelopment without exorbitant costs. The existing road network suits the development to the east of the current CBD – also discussed in the Central Area Design Study with respect to the parking lot offset intersections along Lisgar Avenue.

BIA boundary expansion - Official Plan context

The BIA believes that we must create a new development zone otherwise we risk opening of the Pandora's box which may see leakage of CBD, (Central Business District) retail to either the Norfolk Mall area (southeast Tillsonburg area); or to North Broadway adjacent to the existing Broadway TSB development containing Sobey's, Subway, Pioneer Gas Bar and Anytime Fitness. The Town Official Plan may be challenged in the legal context given the built-out status of the downtown area.

The following OP categories all have relevance and are appropriate to discuss in terms of the proposed BIA zone expansion.

OP: Economic Development – Balanced Assessment

The Town of Tillsonburg Official Plan has a section dedicated to the balancing of residential and commercial/employment land development.

Residential development has outpaced retail sector assessment in each of the last 17 years with the exception of the Canadian Tire and Sobey's stores developments in 2003.

The BIA zone expansion supports this OP section by creating the necessary growth zone to allow for continued development of new retail uses in the Central Business District. During the past number of years, there has been continued development of the retail area at Tillson Avenue and Concession Street East which is also now built out. There is one brownfield site bounded by Tillson Ave., King St. the railway track and First Street which will be fully absorbed for the development of 2 high-rise apartment buildings by Escalade Development Corporation. This development is currently in the development pipeline.

The BIA team believes that retail and commercial growth in the expanded BIA boundary supports the balance required to fulfil the parameters in the town's Official Plan.

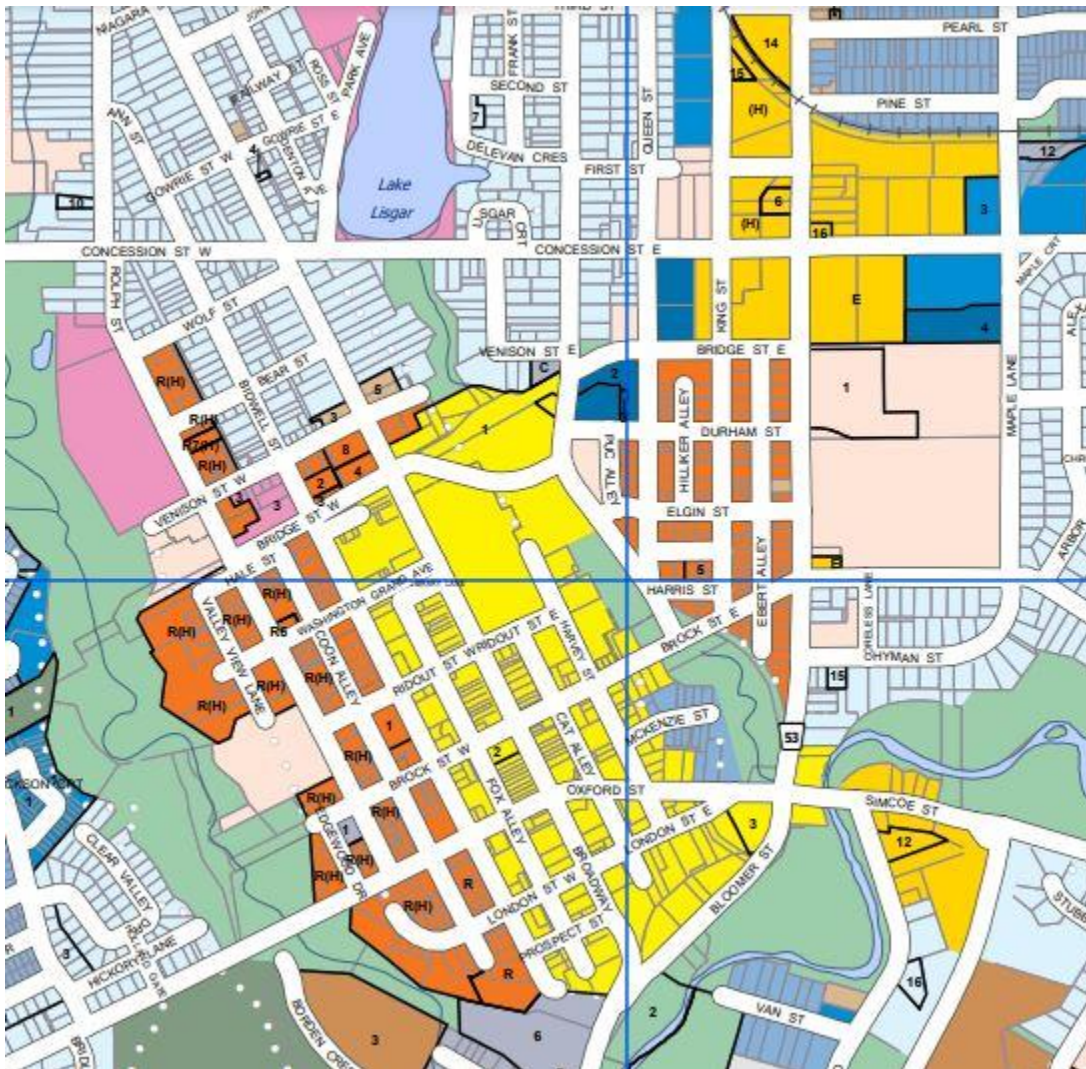
OP: The Central Business District as the hub & heartbeat of the town:

The OP has a section specifically noting that the CBD is in fact the hub and heartbeat of the town.

The BIA Zone expansion allows for the creation and expansion of the existing CBD by planning for new businesses in the CBD area. The BIA Board of Management is concerned about the leakage of new businesses outside of the CBD as there are no shovel-ready sites ready for development in the existing boundaries of the BIA zone.

The OP rightfully contemplated the expansion of the downtown/CBD area to the east.

The attached zoning map highlights by colour, each permitted use including the "entrepreneurial zone" which is coloured in orange.



Future Hotel/Conference Facility

The BIA has advocated and continues to have meaningful discussions with Strathallen about the development of a hotel/conference facility in the CBD. The expansion of the BIA boundary will provide for more flexibility in accommodating this important initiative as the town continues to grow.

The Brook-McIlroy urban design report from 2012 is attached as Exhibit 2 for reference purposes. This study was adopted by council however its recommendations have not been implemented. This study contemplated intensification of some specific town-owned lands in the existing urban core area. Either of the two (2) demonstration sites as proposed would likely be the best location for the proposed hotel/conference facility.



Disclaimer The above figure is not indicative of the materials, details, windows, or other building materials which would be incorporated into the development.

Brook McIlroy Inc. / McCormick Rankin Co.

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Importance of the Tillsonburg Town Centre Mall

The BIA team meets with the mall owner; Strathallen; on a regular basis to understand the performance, changes and impacts of the economy on this important downtown anchor. The Tillsonburg Town Centre Mall (TTCM); continues to be among the better performers in Strathallen's portfolio of centre across Canada. This is important to note as it further supports the importance of the downtown as the main business hub in the tri-county region.

The following tenants have renewed their leases as follows:

- a) Walmart - 5 year term with additional 5-year optional terms
- b) CIBC - 5 year term with additional 5-year optional terms
- c) LCBO- effective April 2021: 5-year renewal with discussion to re-build a new free-standing store on the TTC campus.

There are no retailers of consequence that are forecasted or known to be leaving the TTC mall at this time.

The investments by Walmart - who are currently renovating their TTC store location (approximately \$1 million) which includes significant improvements to the back-end storage areas, employee break room, store signage, interior signage, etc. are a clear statement of confidence in Downtown Tillsonburg.

There are interested national retailers who have shown an interest for potential location to the Tillsonburg market area including Winners, Sport Chek, Popeye's Louisiana Chicken, Bar Burrito and others to name a few. The BIA team continues to work with all downtown business and landowners to advance the collective effort of keeping the CBD relevant and top of mind in their site-selection criteria. It is important to continue to note that where Walmart is located becomes a defining moment in the decision making matrix for other retailers.

Walmart has no intention of leaving the CBD at this time, nor is there a practical or financially feasible alternative location in the tri-county area. The Tillsonburg Walmart store is there only store location in an urban core area in North America.

Expansion of the BIA zone is critical to addressing the needs in the central economic corridor to ensure that all new format retail is located in this area. Creating the sites and road system in the downtown-east area is necessary to accommodate retail growth is not without precedent. This again is support by the town's Official Plan and is discussed in great detail in the Central Area Design Study.

Current and forecasted growth rates

The town is experiencing growth levels much higher than were forecasted by Hemson Consultants. As at October 1st, 2020; the population of the town is 18,005. The number of units under construction and approved for the next 18 months is approximately 900 which translates into another 2,000 +/- residents in the town. During the last census period ending in 2016; the highest population growth in the area was recorded in the Municipality of Bayham which is largely served by the Tillsonburg market area. This too is an impact that positively affects the efficacy of the Central Business District.

A table of the growth rates for the 2016 Census is included below:

Municipality	Growth % 2011-2016	Growth in population:
Bayham	+5.8%	407 persons
Tillsonburg	+3.7%	571 persons
South-West Oxford	+1.6%	120 persons
Norwich	+2.6%	280 persons
Norfolk (western part only)	+0.9%	99 persons

The southwestern Ontario region has become a popular place for people to relocate to for many reasons. The impacts of the pandemic coupled with the cost of housing in London, Kitchener-Waterloo, Hamilton-Burlington-Oakville and the GTA areas is driving most of these changes. This section of the report clearly indicates that the increased residential development activity will place further demands on the function and metrics of the Central Business District. For these reasons; a detailed analysis of the coming impacts is noteworthy and is of consequence.

Housing units under construction or approved for near-term development*:

(*data from County of Oxford, Eric Gilbert, Plans of Subdivision)

Location:	Developer:	# of units:	Population:
97 North St. W.	Southside	107	235
North St. E.	Hayhoe Northcrest	158	348
59 North St. E.	Hayhoe rentals	59	130
360 Quarterline Rd.	Tomico/Braun	10	22
Andrews Crossing	Hayhoe Homes	31	68
98 King Street	Escalade Property Corporation	49	108
143 Tillson Ave.	Escalade Property Corporation	49	108
361 Quarterline Road	Tomico/Braun	104	229
Sandy Court	Various	10	22
Potter's Gate Phase 1 & 2	Oxnard Developments	22	48
Potter's Gate Phase 3 - singles	Oxnard Developments	53	117
Potter's Gate Phase 3 - townhomes	Oxnard Developments	35	77
Oak Park Estates	Trevalli Homes	35	77
Trailview Drive	VictoriaWood	33	73
Mill Pond Apartments	Valour Capital	40	88
North St. - Keba Farm	Hayhoe Homes	184	405
Brookside	Southside	20	44
	Totals:	951	2,092

The population forecast with the above-noted developments for the Town of Tillsonburg - by end of calendar years is as follows:

Year:	Annual unit absorption rate:	Population:
2020	90*	18,100
2021	287	18,731
2022	287	19,362
2023	287	19,993

The demand on services, retail, personal services, government services and offices will require more retail and commercial development space.

It is the strong belief of the BIA Board of Management that these additional demands must be accommodated in the Central Business District area for continued successes into the future.

The change in ownership of the Norfolk Mall retail node is also of concern as this may rekindle interest for large-format retail to locate in an area with lower taxation and more available (shovel-ready) sites for new development.

Proposed new boundary:

The proposed new boundary reflects a pragmatic approach to addressing the needs in the short and medium terms so as to dove-tail with the Official Plan and development pressures as currently being experienced.

There are existing peripheral areas of the downtown which were arbitrarily left out of the BIA with those boundaries running down the middle of streets which made no practical sense either then or now.

The parameters for the new boundaries were predominantly modeled after the study area as defined in the 2012 Brook-McIlroy Central Area Design Study. This study including the methodology and recommendations are used as the starting point for how the proposed new boundaries were determined. It is also important to note that the Town's Official Plan was also used as a guiding document.

The former downtown landfill site is problematic from an environmental and expansion perspective which Town Council and the BIA will need to address in the near future.

The public process will engage the proposed new members and will be held in strict accordance with the Municipal Act. The public engagement process will be very clear

and well-established. The BIA is acutely aware that public feedback and dialogue will ultimately shape the finalized boundaries, if there is any change or if the process is halted.

The BIA has a clear plan to articulate the benefits of said boundary expansion. The important financial impact of note is that if the proposed boundary is adopted without modification; the existing membership will see a decline in BIA assessment on the current base of (11.7%) for the 2021 budget year.

Where possible, in order to construct a contiguous map; the lines are drawn through some residential areas. This is not unlike other BIA's. This has no impact on residential taxation. The intent is to properly link all proximate cultural, heritage and park assets within the 1.0 kilometer zone as discussed in this report.

Note: Only those properties described as "rateable" will see any change to their municipal tax bill. These are described in the act as those zoned as commercial or industrial property tax classes.

There are a number of additional businesses on the cusp of the BIA that should be included in the boundary expansion initiative. These are discussed in the 2021 BIA budget and business plan documents in specific detail and are included in the assessment Excel spreadsheet with the impacts clearly noted.

Economic Development and Retail Recruitment

The BIA continues to liaise with partners in the community to advance the collective interest of economic development while actively searching for new businesses to locate in the Tillsonburg BIA area.

The BIA team continues to gather data and has proactively undertaken efforts to keep in touch with the national, regional and local chain retailers and others to promote the town and the growth profile. This effort is ongoing.

Tillsonburg is still underserved in some retail segments; restaurants; lodging; experiential tourism; microbrewery/wineries; and others.

The pandemic impact is muting some forward action at present however this will not dampen reaching out to build a more robust CBD.

Transportation network plan

The Central Area Design Study also included a detailed analysis of the current and future transportation network for the CBD. This analysis again supports the BIA boundary expansion rationale particularly with reference to the existing entrepreneurial zone:



Legend

Primary Street (Existing)	
Secondary Street (Existing)	
Tertiary Street (Existing)	
Tertiary Connection (Potential)	
Intersection (Signalized)	
Study Area Boundary	

This section of the Central Area Design Study makes clear where the traffic patterns flow in and out of the CBD and entrepreneurial zones of the town. The BIA agrees with these assumptions and analysis. This was also used as a basis for determining the recommended boundaries for the zone expansion.

2021 approved BIA Budget and Business Plans

For review by council and staff; we have attached the budget and business plans which have a greater amount of detail as to the rationale and analysis of the proposed boundary expansion request.

The BIA team is available to review these in detail with members of the Tillsonburg Corporate team and members of town council.

Financial impact

The proposed boundary expansion as presented, leverages the BIA cost base which results in the comparable rateable properties seeing a decline of (-11.7%) vs. FY 2020. The cost to service the new areas is modest and results in leverage to the BIA cost structure on both a short and long term basis. There is no increased request in MOU funds from the Town of Tillsonburg to service this area.

The Tillsonburg Town Centre Mall represents 43% of the current assessment by dollar in the existing BIA. With new expanded zone; the TTC share of the aggregate assessment drops to 34%.

New zone assessment:	\$ 20,219,100
Existing BIA zone assessment:	\$ 76,722,000
Total assessment of new BIA zone:	\$ 96,941,100
2021 BIA levy	\$ 164,270

The larger area presents new opportunity for additional BIA sponsorship revenues via the proposed street banner program which is planned for 2021.

The summary of new zone rateable properties with the financial impact is attached as an enclosure to this report.

Summary:

The Central Business District is currently built out.

The time is now to proactively plan for the addition of areas in the central zone and areas east of the downtown to accommodate the demand in the near and mid-term. Similar approaches were undertaken in 1978-1980 for the construction of the Tillsonburg Town Centre Mall and most recently in 2003 with the realignment of Bridge Street to create the site for Canadian Tire.

The proposed boundary adjustment reflects a balanced approach keeping in mind the following:

- a) Requests by businesses to join the BIA;
- b) Requests by businesses to participate in the Façade Improvement Program;
- c) Natural topographic limitations to the west and south of the existing BIA boundary;
- d) Forecasting of growth already in the pipeline;
- e) Building a bridge between the two (2) existing central commercial areas of the town (Downtown CBD & TILL-CON retail node) as noted in the report in point “g” below;
- f) The need to create additional space for the location of new businesses in the Central Business District area; (including large-format retail);
- g) Implementation of recommendations contained in the Central Area Design Study report from Brook-McIlroy dated August 2012;
- h) Respecting the process as outlined in the Municipal Act;
- i) Respect for the environment and greening of the town;
- j) Implementation of best practices from an urban planning perspective;
- k) Protecting the existing Central Business District;
- l) Ensuring that the partnership that has been built over the past number of years with the Town of Tillsonburg continues forward in the spirit of the continuous improvement philosophy;
- m) The cost of the BIA is leveraged and results in a notable decline in comparable BIA levy assessment per rateable property.

The BIA recommends to the Council of the Town of Tillsonburg that the Clerk of the Municipality begin the process for public engagement to discuss expansion of the existing BIA boundaries as contained in this report. The BIA fully understands that the public engagement process will ultimately shape the final outcome(s) and will be subject to that process in its entirety.

ENCLOSURES: (attached)